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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

APPLE INC.,  
Plaintiff,  
v.  
WI-LAN, INC.,  
Defendant.

AND RELATED  
COUNTERCLAIMS

CASE NO. 3:14-cv-02235-DMS-BLM  
(lead case);  
CASE NO. 3:14-cv-1507-DMS-BLM  
(consolidated)

**APPLE INC.'S NOTICE OF MOTION  
AND MOTION TO EXCLUDE CERTAIN  
OPINIONS OF VIJAY MADISETTI,  
DAVID KENNEDY AND JEFFREY  
PRINCE**

Date: June 1, 2018  
Time: 1:30 p.m.  
Dept.: 13A  
Judge: Hon. Dana M. Sabraw  
Magistrate Judge: Hon. Barbara L. Major

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on June 1, 2018 at 1:30 p.m. in the Courtroom  
 3 of the Honorable Dana M. Sabraw of the above-entitled court, located at 333 W.  
 4 Broadway, San Diego, California 92101, Plaintiff Apple Inc. ("Apple") will and  
 5 hereby does move to exclude certain testimony of Wi-LAN experts Vijay Madisetti,  
 6 Jeffrey Prince and David Kennedy that falls below the admissibility threshold set  
 7 by Federal Rule of Evidence 702 and *Daubert*.

8 This Motion is made pursuant to Civil Local Rule 7.1, and is based on this  
 9 Notice of Motion and Motion, the accompanying Memorandum of Points and  
 10 Authorities, supporting declaration and exhibits, all of which are served and filed  
 11 herewith, the complete records and files of this action, and any argument or  
 12 additional evidence that is permitted by this Court.

13  
 14 Dated: May 1, 2018

DLA PIPER LLP (US)

15  
 16 By /s/ Sean C. Cunningham

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 1, 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the CM/ECF registrants.

/s/ Sean C. Cunningham  
Sean C. Cunningham